

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

HANGZHOU KAILAI NECKWEAR : Case No. 15-CV-1441 (AN)
APPAREL CO. LTD.,
:

Plaintiff,
:

NOTICE OF MOTION

-against-

NCP DIRECT SOURCING, INC., NCP DIRECT
SOURCING, INC., THOMAS PAGLIA, AND
JOHN DOE 1-10, AND XYZ COMPANY 1-10,
:

Defendants
:

X

**NOTICE OF MOTION OF TEITELBAUM & BASKIN, LLC TO WITHDRAW AS
COUNSEL FOR DEFENDANTS NCP DIRECT SOURCING, INC., NCP DIRECT
SOURCING INC. AND THOMAS PAGLIA**

PLEASE TAKE NOTICE, that upon the accompanying affidavit of Jay Teitelbaum, Esq, sworn to January 8, 2016, and the motion of Teitelbaum & Baskin, LLC, dated January 8, 2016, Teitelbaum & Baskin will move this Court before the Honorable Allison J. Nathan, U.S.D.J. at the United States Courthouse for the Southern District of New York, 40 Foley Square, New York, New York, Courtroom 906 on February 1, 2016, at 9:30 a. m. or as soon thereafter as counsel may be heard, why an order should not be entered pursuant to Sothern District Local Civil Rule 1.4, granting Teitelbaum & Baskin's Motion to withdraw as counsel for defendants; and for such other and further relief as the Court may deem just and proper.

The basis for the motion is the failure of Defendants to pay actual and necessary legal fees and expenses incurred and to be incurred on behalf of Defendants.

Dated: White Plains, New York
January 8, 2016

/s/ Jay Teitelbaum

TEITELBAUM & BASKIN, LLC

*Attorneys for NCP Direct Sourcing, Inc. and
Thomas Paglia*

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